

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

Defendant's Motion to Modify Conditions of Release

Comes now the defendant, Cole E. White, by and through counsel, and hereby moves the Court to modify the Order Setting Conditions of Release to remove the requirement of his being monitored by radio frequency. In support of this motion, counsel states:

1. On May 22, 2019, the Defendant was released on conditions pending his November 25, 2019 sentencing hearing. ECF No. 123. Upon the recommendation of the Probation Office and with the parties' consent, the condition requiring the Defendant to submit to location monitoring was modified on May 23, 2019, to require monitoring by radio frequency (ankle monitor), rather than voice recognition. ECF No. 126.

2. On November 21, 2019, Defendant's sentencing hearing was rescheduled from November 25, 2019, until July 2, 2020. ECF No. 201.
3. While released on conditions, Defendant has remained fully compliant with all conditions of his release, and has been either employed or attending college, or both.
4. Counsel for Mr. White has consulted with counsel for the government, who has no objection to this motion.

WHEREFORE, Defendant White respectfully moves the Court to modify the terms of his Conditions of Release and remove the condition of location monitoring by radio frequency.

Respectfully submitted,

COLE E. WHITE

By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: counsel of record in this case.

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